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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

MEDFORD DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 1:22-cr-00076-MC
)	
v.)	MOTION TO CONTINUE
)	PLEA DATE
DANIEL PONCE-GONZALEZ,)	
)	
Defendant.)	

Defendant, Daniel Ponce-Gonzalez, by and through his attorney, Justin N. Rosas, respectfully moves for entry of an order continuing the Plea date in this case for a period of approximately 30 days to a new Plea date on or about May 29, 2023. This motion is made in the interests of justice and not for the purpose of delay and we waive time under the speedy trial act for that delay. Counsel has contacted counsel for the government who does not oppose the requested relief.

FACTS

1. A plea is scheduled in Mr. Ponce-Gonzalez's case on May 1, 2023.
2. Mr. Ponce-Gonzalez is charged by indictment, with Unlawful Possession with Intent to Distribute and Forfeiture.
3. Defense counsel had a family matter arise and needed additional time.
4. Counsel requests that all this time be excluded under a Speedy Trial Act, including up to 30 days, and including the 30 days from May1, 2023 to May 29, 2023.
5. Defense Counsel has contacted Mr. Marco Boccato, counsel for the Government, regarding this motion. Mr. Bocatto advises that he does not oppose this motion.
6. This motion is made in the interests of justice and not for the purpose of delay.

CONCLUSION

For the reasons set forth herein, Mr. Ponce-Gonzalez respectfully moves for entry of an order continuing the Plea date in this cause for a period of up to 30 days to on or about May 29, 2023.

RESPECTFULLY SUBMITTED this May 4, 2023

/s/Justin N. Rosas
Justin N. Rosas, OSB 076412
Attorney for Daniel Ponce-Gonzalez